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September 26, 2001

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

RE: CC Docket Nos. 96-45 and 00-256

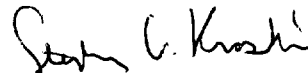
Dear Ms. Salas:

On September 25, 2001, Ben Dickens of Blooston, Mordkofsky, Jackson and Dickens, Lisa Zaina of Wallman Strategic Consulting, LLC and I met with Commissioner Kathleen Abernathy and her legal advisor Matthew Brill to discuss the above-captioned matter. Attached is a list of more than 200 small and rural companies we represent in this matter.

We discussed the adverse public policy ramifications of adopting an impending order in the above-captioned proceeding and urged the Commissioner to consider forgoing adoption. In order to develop an appropriate record for adoption of access reform for the small and rural companies, the Commission should not adopt the proposed order, but instead issue an NPRM to allow the necessary discourse and study to take place regarding universal service, access and rate structures for the small and rural carriers. Adoption of the proposed order will not serve the interests of rural customers.

We discussed the potential increase in the Subscriber Line Charge (SLC) for rural telephone company customers. We recommended that the Commission not increase the SLCs at this time. We raised the need for understanding of the potential impact of the potential increases on universal service and the deployment of advanced services in the rural areas presently subject to rate of return regulation in contrast to those areas considered more market driven and served by carriers subject to price-cap incentive regulation.

Sincerely,



Stephen G. Kraskin

Cc: Commissioner Abernathy
Matthew Brill

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List ABCDE

**MEMBERS OF THE ALLIANCE OF
INCUMBENT RURAL INDEPENDENT TELEPHONE COMPANIES**

**Accucom Telecommunications, Georgia
Adams Telephone Cooperative, Illinois
Albion Telephone Co. (ATC Communications), Idaho
Alenco Communications, Inc., Texas
Alpine Communications, Iowa
Armstrong Telephone Company of Maryland
Armstrong Telephone Company of New York
Armstrong Telephone Company of Pennsylvania
Armstrong Telephone Company of West Virginia
Ballard Rural Telephone Cooperative Corporation, Inc., Kentucky
Barry County Telephone Company, Michigan
Bay Springs Telephone Co., Inc., Mississippi
Bentleyville Communications Corporation, Pennsylvania
Berkshire Telephone Company, New York
Bixby Telephone Company, Oklahoma
Brindlee Mountain Telephone Co., Inc., Alabama
Bulloch Telephone Cooperative, Georgia
Campti-Pleasant Hill Telephone Co., Louisiana
Cap Rock Telephone Cooperative, Inc., Texas
Cascade Utilities, Oregon
Central Montana Communications, Inc., Montana
Champlain Telephone Company, New York
Citizens Telephone Company of Hammond, N.Y., Inc, New York
Clear Lake Independent Telephone Company, Iowa
Climax Telephone Co., Michigan
Coalfields Telephone Company, Kentucky
Coleman Coounty Telephone Cooperative, Texas
Colorado Valley Telephone Cooperative, Inc., Texas
Com South Telecommunications, Inc., Georgia
Consolidated Telecom., North Dakota
Copper Valley Telephone Company, Arizona
Crockett Telephone Co., Inc., Tennessee
Cumby Telephone Co-op, Texas
Darien Telephone Company, Georgia
Davieess Martin County Rural Telephone Corporation, Indiana
Decatur Telephone Co., Mississippi
The Deerfield Farmers' Telephone Company, Michigan
Delhi Telephone Company, New York
Delta Telephone Co., Inc., Mississippi
Dunkirk & Fredonia Telephone Co., New York**

Egyptian Telephone Cooperative Association, Illinois
Ellijay Telephone Company, Georgia
Empire Telephone Corporation, New York
Fail Telecommunications Corporation, Mississippi and Georgia
Farmers Telephone Cooperative, Inc., South Carolina
Five Area Telephone Cooperative, Inc., Texas
Flat Rock Telephone Co-operative, Illinois
Franklin Telephone Co., Inc., Mississippi
Gearheart Communications, Inc., Kentucky
Georgetown Telephone Company, Mississippi
Germantown Telephone Company, Inc., New York
Gila River Telecommunications, Inc., Arizona
Glenwood Telephone Company, Georgia
Gridley Telephone Co., Illinois
Hancock Telecom, Indiana
Hardy Telecommunications, Inc., West Virginia
Heart of Iowa Telecommunications Cooperative, Iowa
Home Telephone Co., Illinois
Hopper Telephone LLC, Alabama
Horry Telephone Cooperative, Inc. South Carolina
Lackawaxen Telephone Co., Pennsylvania
LaFourche Telephone Company, Louisiana
La Harpe Telephone Co., Inc., Illinois
Lakeside Telephone Company, Mississippi
Ligonier Telephone Co., Inc., Indiana
Lincolntown Telephone Company, Maine
Mark Twain Rural Telephone Co., Missouri
McDonough Telephone Cooperative, Illinois
Mid Century Telephone Cooperative, Illinois
Mid Maine Communications, Maine
Mid-Missouri Telephone Company, Missouri
Mid-Rivers Telephone Cooperative, Inc., Montana
Midstate Telephone Company, North Dakota
Minnesota Valley Telephone Co., Inc., Minnesota
Modern Telecommunications Company, Missouri
Moundville Telephone Company, Inc., Alabama
Moundridge Telephone Company, Kansas
Mulberry Cooperative Telephone, Indiana
National Telephone Co. of Alabama, Inc., Alabama
The Nebraska Central Telephone Company, Nebraska
Nehalem Telephnoe and Telegraph Co., Oregon
Nelson Telephone Cooperative, Wisconsin
Nemont Telephone Cooperative, Montana
New Paris Telephone Co., Indiana
New Windsor Telephone Co., Inc., Illinois

North Central Telephone Cooperative, Tennessee
Northeast Missouri Rural Telephone Company, Missouri
Northwest Communications Cooperative, North Dakota
Nortex Communications, Texas
Northeast Nebraska Telephone Company, Nebraska
The North-Eastern Pa. Telephone Co., Pennsylvania
North Pittsburgh Telephone Co., Pennsylvania
Oneida County Telephone Company, New York
Oneida Telephone Exchange & Cablevision, Inc., Illinois
Ontario Telephone Co., New York
Otelco Telephone LLC, Alabama
Paul Bunyan Rural Telephone Cooperative, Minnesota
PBT Telecom, Inc., South Carolina
Peoples Telecommunications, Kansas
Peoples Telephone Co., Inc., Tennessee
Perry-Spencer Rural Telephone Cooperative, Inc., Indiana
Piedmont Rural Telephone Cooperative, South Carolina
Pioneer Telephone Cooperative, Oklahoma
Pioneer Telephone Cooperative, Oregon
Plant Telephone Company, Georgia
Planters Rural Telephone Co-op, Georgia
Poka Lambro Telephone Cooperative, Inc., Texas
Preston Telephone Co., Iowa
Progressive Rural Telephone Cooperative, Inc., Georgia
Project Telephone Company, Montana
Reynolds Telephone Company, Illinois
Ringgold Telephone Company, Georgia
Rio Virgin Telephone Company, Nevada
Roanoke Telephone Co., Inc., Alabama
Roosevelt County Rural Telephone Cooperative, New Mexico
RT Communications, Wyoming
Rye Telephone Company, Colorado
Salina-Spavinaw Telephone Company, Inc., Oklahoma
Sanborn Telephone Cooperative/Sancom, Inc., South Dakota
San Carlos Apache Telecommunications Utility, Inc., Arizona
Scio Mutual Telephone Association, Oregon
Siskiyou Telephone, California
Skyline Telephone Cooperative, North Carolina
Sledge Telephone Co., Mississippi
Smithville Telephone Company, Indiana
Smithville Telephone Company, Mississippi
South Central Utah Telephone Association, Inc., Utah
South Park Telephone Co., Colorado
South Plains Telephone Cooperative, Inc., Texas
Southwest Texas Telephone Company, Texas

Springport Telephone Co., Michigan
Spruce Knob Seneca Rocks Telephone Co., West Virginia
Stayton Cooperative Telephone Company, Oregon
Taylor Telephone Cooperative, Texas
Tidewater Telephone Company, Maine
Tohono O'odham Utility Authority, Arizona
Topsham Telephone Company, Inc., Vermont
Trenton Telephone Company, Georgia
Triangle Telephone Cooperative Association, Inc., Montana
Trumansburg Telephone Co., New York
Valley Telecommunications, Montana
Valley Telephone Cooperative Arizona
Valley Telephone Cooperative New Mexico
Van Horne Co-op Telephone Co., Iowa
Ventura Telephone Company, Iowa
Viola Home Telephone Co., Illinois
Waverly Hall Telephone, LLC, Georgia
West Side Telephone Company, West Virginia
West Tennessee Telephone Co., Inc., Tennessee
Wilkes Telephone & Electric Company, Georgia
Winnebago Cooperative Telephone Association, Iowa
Winthrop Telephone Co., Inc., Minnesota

Companies And Associations Supporting Plains Rural Independent Concerns and Positions

Iowa

- | | |
|-------------------------------|------------|
| 1. Alpine Communications, LLC | Des Moines |
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Kansas

- | | |
|----------------------------------|------------|
| 1. Moundridge Telephone Co, Inc. | Moundridge |
|----------------------------------|------------|

Nebraska

- | | |
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| 1. Cambridge Telephone Co. | Cambridge |
| 2. Clarks Telecommunications Co. | Clarks |
| 3. Consolidated Telephone Co. | Lincoln |
| 4. Curtis Telephone Co. | Curtis |
| 5. Great Plains Communications | Blair |
| 6. Hamilton Telecommunications | Aurora |
| 7. Hartington Telecommunications, Inc. | Hartington |
| 8. Hershey Cooperative Telephone Co. | Hershey |
| 9. Hooper Telephone Co. | Remson, IA |
| 10. HunTel Systems, Inc. | Blair |
| 11. K&M Telephone Co. | Chambers |
| 12. Nebraska Central Telephone Co. | Gibbon |
| 13. Northeast Nebraska Telephone Co. | Jackson |
| 14. Pierce Telephone Co., Inc. | Pierce |
| 15. Southeast Nebraska Telephone Co. | Falls City |
| 16. Stanton Telecom, Inc. | Stanton |
| 17. Three River Telco | Lynch |
| 18. Mainstay Communications | Henderson |

Oklahoma

- | | |
|----------------------------|----------|
| 1. Totah Telephone Co. Inc | Ochelata |
|----------------------------|----------|

South Dakota Telecommunications Association (Members Include)

- | | |
|---|-------------|
| 1. Armour Independent Telephone Company | Hartford |
| 2. Baltic Telecom Cooperative | Baltic |
| 3. Beresford Municipal Telephone Company | Beresford |
| 4. Bridgewater-Canistota Independent Telephone | Hartford |
| 5. Swiftel Communications | Brookings |
| 6. Cheyenne River Sioux Tribe Telephone Authority | Eagle Butte |
| 7. Dakota Community Telephone | Irene |
| 8. East Plains Telecom, Inc. | Baltic |
| 9. Faith Municipal Telephone Company | Faith |
| 10. Fort Randall Telephone Company | Wagner |
| 11. Golden West Telecommunications Cooperative | Wall |
| 12. Interstate Telecommunications Cooperative | Clear Lake |
| 13. James Valley Telecommunications | Groton |
| 14. Long Lines | Jefferson |

15. Kadoka Telephone Company
16. Kennebec Telephone Company
17. McCook Cooperative Telephone Company
18. Midstate Communications
19. Mt. Rushmore Telephone Company
20. Roberts County Telephone Cooperative
21. RC Communications, Inc.
22. Santel Communications
23. Sioux Valley Telephone Company
24. Splitrock Properties, Inc.
25. Splitrock Telecom Cooperative
26. Stockholm-Strandburg Telephone Company
27. Sully Buttes Telephone Cooperative
28. Tri-County Telcom, Inc.
29. Union Telephone Company
30. Valley Telecommunications Cooperative
31. West River Cooperative Telephone Company
32. West River Telecommunications Cooperative
33. Western Telephone Company

Kadoka
Kennebec
Salem
Kimball
Keystone
New Effington
New Effington
Woonsocket
Dell Rapids
Brandon
Brandon
Stockholm
Highmore
Emery
Hartford
Herreid
Bison
Mobridge
Faulkton